

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**LEROY SECHEREST, ET AL.**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 3:24-CV-00034-TSL-MTP**

**CITY OF LEXINGTON, ET AL.**

**DEFENDANTS**

**MUNICIPAL DEFENDANTS THE CITY OF LEXINGTON  
AND ROBIN MCCRORY'S  
MOTION TO DISQUALIFY COUNSEL**

Municipal Defendants the City of Lexington and Robin McCrory move to disqualify Attorney Jill Jefferson under Local Rule 83.1 and this Court's inherent authority. In addition to the contemporaneously filed supporting memorandum, Municipal Defendants provide the following exhibits:

Exhibit "A" – Sept. 26, 2024 WASHINGTON POST article, *Justice Department finds Lexington, Miss., police ran illegal 'debtor's prison'*

Exhibit "B" – July 3, 2024 WASHINGTON POST article, *She took on a small Mississippi town's police. Then they arrested her.*

Exhibit "C" – Sept. 28, 2024 Facebook video (conventionally filed)

Exhibit "D" – Dec. 11, 2024 email & letter

Exhibit "E" – Form 990

Exhibit "F" – Dec. 11, 2024 email chain

Exhibit "G" – Application for Certificate of Authority

Exhibit "H" – Public Records Request

Exhibit "I" – Dec. 2, 2024 Email

For the reasons explained in the accompanying memorandum, Municipal Defendants request that their motion to disqualify be granted.

Dated: December 18, 2024.

Respectfully submitted,

PHELPS DUNBAR, LLP

BY: /s/ G. Todd Butler

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**ATTORNEYS FOR MUNICIPAL  
DEFENDANTS THE CITY OF LEXINGTON  
AND ROBIN MCCRORY**

**CERTIFICATE OF SERVICE**

I certify that, on December 18, 2024, I had this motion electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ G. Todd Butler  
G. Todd Butler